

FILED

MAR 17 1998

AT 8:30 .....  
WILLIAM T. WALSH  
CLERK

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(973)962-7179

Attorney for Defendant  
Richard Calanni

WALSH SECURITIES, INC.	:	UNITED STATES DISTRICT COURT
	:	FOR THE DISTRICT OF NEW JERSEY
	:	
Plaintiff,	:	CIVIL ACTION NO.: CV973496 (WJB)
	:	
-VS-	:	
	:	
CRISTO PROPERTY MANAGEMENT LTD.,	:	NOTICE OF MOTION TO
et als.	:	PROVIDE RULE 26
	:	DOCUMENTS
	:	
Defendant,	:	
	:	

TO: Michael Cheroff, Esq.  
Latham & Watkins  
One Newark Center, 16th Floor  
Newark, NJ 07101

U.S. Attorney  
970 Broad Street  
Room 700  
Newark, NJ 07102  
Attn: Mark Farley, Esq.


**PLEASE TAKE NOTICE** that, on March 30, 1998 at 10:00 in the forenoon, or as soon thereafter as counsel may be heard, the undersigned counsel for the defendant Richard Calanni shall move before the Honorable William G. Bassler, United States District Court for the District of New Jersey, Martin Luther King, Jr. Federal Building and United States Courthouse, 50 Walnut Street, Newark, New Jersey, for an Order requiring the United States Attorney to provide to the defendant, Richard Calanni, one copy

without cost, of all records, correspondence, and appraisals, provided by the defendant Richard Calanni to the United States Attorneys Office pursuant to subpoena.

**PLEASE TAKE FURTHER NOTICE** that, in support of this motion, the defendant shall rely upon the Affidavit of Richard Calanni submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted herewith.

Dated: March 12, 1998

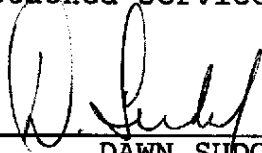
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AUGUST W. FISCHER, ESQ.  
Attorney for Richard Calanni

**CERTIFICATION OF SERVICE**

I hereby certify that on the 16 day of March 1998, I caused a copy of defendant Richard Calanni's Notice of Motion to Provide Rule 26 Documents, Affidavit of Richard Calanni and proposed Order, to be served to the attached service list.

Dated:

  
\_\_\_\_\_  
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